

# EXHIBIT 1

**From:** Polins, Greg  
**To:** Armando Lozano; Matt Juren; #KE HAL-NOV; #KE SLB-NOV; Kelly Stephens  
**Cc:** Brooke Behrens; Harry Susman; Jill McCrary; Al Deaver; [bmcaughan@md-iplaw.com](mailto:bmcaughan@md-iplaw.com)  
**Subject:** RE: NOV/SLB et al - ESI  
**Date:** Wednesday, October 11, 2023 5:12:29 PM

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**EXTERNAL Email**

Armando – NOV sprung its request to discuss SLB, Ulterra, and Varel ESI custodians today, with less than 24 hours' notice. The Court has not entered an ESI Order in the SLB/Uterra/Varel litigation because of NOV's refusal to agree to reasonable discovery limits, and we have not yet had a chance to discuss with our clients NOV's new proposal. We will take NOV's proposal back to our clients and provide our position once we've had a chance to discuss it with them, but we will not be addressing ESI issues tomorrow for the SLB/Uterra/Varel litigation. Regardless of that discussion though, as Judge Hanen ruled, the Halliburton and SLB/Uterra/Varel cases are separate, and we reject any effort by NOV to improperly combine them. We will address any issues related to Civ. No. 4:23-cv-00730 (SLB/Uterra/Varel) on a separate call from Civ. No. 4:23-cv-01789 (Halliburton).

Regards,

**Greg Polins**

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**From:** Armando Lozano <[ALozano@susmangodfrey.com](mailto:ALozano@susmangodfrey.com)>  
**Sent:** Wednesday, October 11, 2023 3:59 PM  
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**Subject:** RE: NOV/SLB et al - ESI

Counsel,

The purpose of tomorrow's call is to understand the universe of ESI custodians with relevant knowledge for each party and to coordinate a plan to exchange proposed search terms. We do not see why an ESI order in the SLB/Varel/Uterra case is necessary for that discussion. And having that discussion might help the parties come to an agreement regarding ESI custodians without court intervention.

Of course, if, during the call, you or counsel for SLB/Uterra/Halliburton would like to propose some combination of custodians from NOV that exceeds what the parties have already agreed to in the cases, we will take that under advisement, but not having an ESI order should not be an obstacle to having this preliminary conversation. We look forward to our

discussion tomorrow.

Best,

**Armando Lozano**

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**From:** Matt Juren <[mjuren@patent-lawyers.com](mailto:mjuren@patent-lawyers.com)>  
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**EXTERNAL Email**

Good Morning Armando,

One or both of us can make ourselves available. However, we must note that the judge has not ruled on the parties' disputed ESI/discovery issues including the number of custodians per party grouping (ECF 57, #9.iii).

Is NOV willing to agree to Defendants' proposals for the ESI and discovery orders? Otherwise, we do not believe it is appropriate to have this discussion until there is more certainty around the discovery limitations in this matter.

Please let me know if you would like to discuss further.

Sincerely,

-Matt

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**From:** Armando Lozano <[aLozano@susmangodfrey.com](mailto:aLozano@susmangodfrey.com)>  
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**Subject:** NOV/SLB et al - ESI

Matt, Kelly,

Tomorrow Kirkland's team is meeting with us to discuss ESI custodians/search terms in the NOV matter at 9:30 AM. Do you two have availability to join on behalf of Varel?

Best,

**Armando Lozano**

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